



## O & G PROFESSIONALS, INC.

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June 3, 1998

Mr. David S. Guzy, Chief  
Rules and Publications Staff  
Royalty Management Program  
Minerals Management Service  
P O Box 25165, Mail Stop 3021,  
Denver, CO 80225-0165

Re: Federal Register/  
Vol 63, No. 67  
April 8, 1998

Dear Sir:

O & G Professionals is currently filing the information required by Form MMS-2014 by Electronic Mail, for 12 clients, where we report and pay the federal royalty. This method is superior to Form MMS-2014 paper reporting and has reduced our cost and extended our available time by 48 hours, thus providing more accurate reporting. We, therefore, support the transition to all electronic reporting.

However, the 10 day extension of the due date for the production reporting on the Form MMS-3160 to the 25th of the second month following production will place us in jeopardy in meeting the Form MMS-2014 due date of the last day of the second month (estimated payment extended).

We report and pay on the basis of the entitlement requirement and must have access to the Form MMS-3160 volumes reported by the various operators. The operators report to us in various formats; e.g. disks, faxed spread sheets and hard copies of the Form MMS-3160, which, under the present time table, is not made available until the 20nd or 21st of the second month. The proposed extension would likely preclude the data being available timely.

This situation could be mitigated by making the Form MMS-3160 information available from the appropriate MMS repository for an electronic transfer as soon as received. An alternative would be a five (5) day extension in the filing due date of the Form MMS-2014.

We appreciate the opportunity to provide our comments. Also, please feel free to include O & G Professionals in the list of reporters that have MMS-approved electronic reporting formats.

Very truly yours,

R. R. Eades  
President